



**CSDVRS, LLC**  
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March 13, 2013

Via Electronic Filing

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12th Street SW  
Washington, D.C. 20554

**RE: Ex Parte Notice: CG Docket Nos. 10-51 and 03-123**

Dear Ms. Dortch:

On March 11, 2013, Lydia Runnels, Vice President, Product Development and Engineering and the undersigned of CSDVRS, LLC (“ZVRS”) met with Karen Peltz Strauss and Robert Aldrich, Consumer and Governmental Affairs Bureau, and Gregory Hlibok, Eliot Greenwald and Elaine Gardner, Disability Rights Office.

ZVRS discussed about interoperability consistent with its comments filed in response to the Commission’s Public Notice.<sup>1</sup> There is no question that the continuing non-interoperability of VRS provider networks and their videophones have caused grievous harm to consumers in violation of their civil rights. We reiterated our support for the FCC for a third party test and certification system be established to have the CPE (hardware and software) and gateways tested and certified as interoperable. We said that until there is a mandate enforced by the FCC and a mechanism to support it, VRS provider networks will not interoperate in a uniform, consistent or reliable manner. ZVRS reiterated its recommendation that a “blue ribbon” advisory committee comprised of industry technology experts and consumers be established within the third party

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<sup>1</sup> *Additional Comment Sought on Structure and Practice of the Video Relay Service (VRS) Program and on Proposed VRS Compensation Rates*, Public Notice, CG Docket Nos. 03-123 and 10-51, DA 12-1644 (October 15, 2012); *Structure and Practices of the Video Relay Service Program; Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, Comments of CSDVRS, LLC, CG Docket Nos. 10-51 and 03-123 (“Comments of CSDVRS”) (November 14, 2012).

testing and certifying entity and charged with providing consensus built and experience validated deliverables within specific timelines.

We opined that the Commission should establish a deadline of not more than a year. At that point, all VRS provider networks and videophones must be fully certified as interoperable in order to be eligible for compensation from the TRS Fund.

We said that the third party system should only support interoperability and not include video communication services or video interpreting. VRS providers are best situated to provide customers with VRS services to support their access to video technology and should be appropriately compensated for the extent of their services. The Commission should issue a Request For Proposals (RFP) for a vendor to create and administer this system and exclude VRS providers from the bidding as was the case for the iTRS database RFP.

ZVRS discussed the attached testing matrix which continues to evince the non-interoperability of Sorenson nTouch videophones with ZVRS videophones. Especially egregious was the inability of a nTouch PC to connect with ZVRS' video interpreter. We also discussed Sorenson VP200 being pushed with a new firmware last September or October which caused significant interoperability issues with certain ZVRS videophones. Sorenson did not communicate with us about the new firmware. Instead, ZVRS learned about it through numerous customer complaints. Sorenson has left it to ZVRS to resolve the non-interoperability issue by making its videophones compatible with the new firmware. ZVRS believes that Sorenson is in violation of the Commission's interoperability rules, per call. Sorenson has consistently declined ZVRS' requests to exchange their videophones to improve testing for interoperability. A third party system such as the one described above would prevent such issues by requiring that any new VRS provider videophone or changes to their videophones are certifiably interoperable.

Sincerely,

/s/

Jeff Rosen  
General Counsel

cc: Karen Peltz Strauss  
Robert Aldrich  
Gregory Hlibok  
Eliot Greenwald  
Elaine Gardner

Attachment